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ECONOMIC COMMISSION
FOR EUROPE

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Ref: Pre-admissibility

10 October 2017

Dominique Doyle
Lawyer
ClientEarth
London, United Kingdom

George Chasiotis
Legal Coordinator
The World Wide Fund for Nature (WWF) Greece
Athens, Greece

Dear Ms. Doyle, dear Mr. Chasiotis,

Re: Communication to the Aarhus Convention Compliance Committee concerning compliance by Greece in the context of public participation in the preparation of a transitional national plan under the Industrial Emissions Directive

I refer to the communication submitted by you on 3 August 2017 on behalf of ClientEarth and WWF Greece. The communication alleged non-compliance with articles 6 and 7 of the Convention in the context of the preparation of a transitional national plan (TNP) under the Industrial Emissions Directive by the Party concerned.

I write to inform you that the Chair and the Vice Chair of the Compliance Committee have reviewed your communication and requested that the secretariat invite you to provide further information on the use of domestic remedies relevant to your communication. Specifically, the Chair and Vice-Chair invite you address the following:

1. When and how did you learn of the adoption of the TNP, e.g. through the publication in the Official Government Gazette on 20 August 2015 or otherwise?
2. What were the relevant timeframes for challenging the adoption of the TNP? What types of procedures existed to challenge the TNP (even if none of these were used)?
3. Please provide further information and clear evidence to substantiate each of the submissions set out in paragraphs 56 (a), (c) and (d) of your communication. This should not be limited to isolated examples, but you should provide evidence that demonstrates that these submissions reflect the practice in general.
4. Regarding paragraph 56 (b), please explain why this would affect available domestic remedies in Greece and provide suitable evidence in support of your explanation. Have you or any other member of the public complained to the European Commission regarding the lack of public participation prior to the adoption of the TNP, and if so, what was the outcome of that complaint?

We would be grateful to receive your reply to the above request for clarification by **Monday, 6 November 2017** in order that your communication may be considered by the Committee for a possible determination of preliminary admissibility at its fifty-ninth meeting (Geneva, 11-15 December 2017). If you consider that a longer timeframe would be necessary in order to reply to the request, we would be grateful to receive your reply by **Monday, 29 January 2018**, in order that your communication may potentially be considered for a determination of preliminary admissibility at the Committee's sixtieth meeting (Geneva, 5-9 March 2018).

I hope the above may be of assistance. Please do not hesitate to contact the secretariat if you have any questions.

Yours sincerely,



Fiona Marshall
Secretary to the Aarhus Convention Compliance Committee